

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

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In re:

J. C. PENNEY COMPANY, INC., *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 20-20182 (DRJ)  
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) (Jointly Administered)  
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**NOTICE OF REJECTION OF UNEXPIRED LEASES**

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**PLEASE TAKE NOTICE** that on June 11, 2020, the United States Bankruptcy Court for the Southern District of Texas (the “Court”) entered an order on the motion of the above-captioned debtors and debtors in possession (the “Debtors”) approving procedures for the rejection of executory contracts and unexpired leases and granting related relief [Docket No. 722] (the “Procedures Order”).

**PLEASE TAKE FURTHER NOTICE** that, the Debtors hereby provide this “Notice of Rejection of Unexpired Leases” (the “Notice”) of their intent to reject the Leases listed in the schedule attached hereto as **Attachment I**. Pursuant to the terms of the Procedures Order, the Leases shall be deemed rejected effective as of the later of (a) the date set forth in the schedule attached hereto as **Attachment I** and (b) the date upon which the Debtors in writing (email sufficient) surrender the premises to the landlord and (i) return the keys, key codes, or security codes, if any, to the affected landlord or (ii) notify the affected landlord in writing (email sufficient) that the keys, key codes, and security codes, if any, are not available, but the landlord may rekey the leased premises (the “Rejection Date”).

**PLEASE TAKE FURTHER NOTICE** that, the Debtors intend to abandon the personal property remaining in or on the property that is the subject of the above-referenced Leases as described in the schedule attached hereto as **Attachment I** (if any). Pursuant to the terms of the Procedures Order, upon entry of the Rejection Order (defined below), the landlord shall be entitled to use or dispose of such abandoned personal property without further notice or order from this Court and without notice or liability for such disposal to the Debtors or any third party.

**PLEASE TAKE FURTHER NOTICE** that, if you object to the Debtors’ rejection of one or more of the Leases, or the abandonment of the above-described personal property (if any), listed in the schedule attached hereto as **Attachment I**, you must file and serve by ***electronic mail*** a written objection so that such objection is filed with the Court and ***actually received*** no later than fourteen (14) days after the date that the Debtors served this Notice by the following parties:

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://cases.primeclerk.com/JCPenney>. The location of Debtor J. C. Penney Company, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 6501 Legacy Drive, Plano, Texas 75024.

(i) counsel for the Debtors, Kirkland & Ellis LLP, Attn.: Rebecca Blake Chaikin (rebecca.chaikin@kirkland.com), Jake William Gordon (jake.gordon@kirkland.com), Nick Krislov (nick.krislov@kirkland.com), and Chris Ceresa (chris.ceresa@kirkland.com); (ii) co-counsel to the Debtors, Jackson Walker L.L.P., Attn.: Matthew D. Cavanaugh (mcavanaugh@jw.com), Jennifer F. Wertz (jwertz@jw.com), Kristhy M. Peguero (kpeguero@jw.com), and Veronica A. Polnick (vpolnick@jw.com); (iii) the United States Trustee (the “U.S. Trustee”), Attn.: Stephen Statham, Esq. (stephen.statham@usdoj.gov) and Hector Duran, Esq. (hector.duran.jr.@usdoj.gov); (iv) counsel to certain first lien creditors, Attn.: Dennis F. Dunne (ddunne@milbank.com), Brian Kinney (bkinney@milbank.com), and Kevin O’Shea (koshea@milbank.com); (v) counsel to the ABL Agent, Attn.: Daniel F. Fiorillo, Esq. (dfiorillo@otterbourg.com) and Chad B. Simon, Esq. (csimon@otterbourg.com); and (vi) counsel to the Committee, Attn: Cathy Hershcopf (chershcopf@cooley.com), Summer McKee (smckee@cooley.com), Seth Van Aalten (svanaalten@coleschotz.com), and Sarah Carnes (scarnes@coleschotz.com) (clauses (i) through (vi) collectively, the “Rejection Notice Parties”).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the terms of the Procedures Order, if no objection is filed and served in accordance with the above procedures, the Debtors will include and file with the Court the above-described Leases in a rejection schedule attached to the proposed form of order under a certificate of no objection, substantially in the form attached hereto as **Attachment II** (the “Rejection Order”).

**PLEASE TAKE FURTHER NOTICE** that, if an objection is properly filed and served on the Debtors and the Rejection Notice Parties, as specified above, unless such parties agree otherwise in writing, a hearing will be scheduled to consider that objection. The Leases will only be deemed rejected upon entry by the Court of a consensual form of Rejection Order filed under certificate of counsel resolving the objection as between the objecting party and the Debtors, or upon further order of the Court.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the terms of the Procedures Order, if the Debtors have deposited monies with a landlord pursuant to a security deposit or otherwise, the landlord holding such monies may not set-off or recoup or otherwise use such monies without (i) prior approval of the Court or (ii) agreement of the Debtors.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the terms of the Procedures Order, if you have a claim for any damages as a result of the Debtors’ rejection of the above-referenced Leases, or the abandonment of the below-described personal property (if any), you must submit a proof of claim by the later of (i) the deadline for filing proofs of claim established in these chapter 11 cases, (ii) thirty (30) days after the Rejection Date set forth in the schedule attached hereto as **Attachment I**, and (iii) thirty (30) days after entry of the applicable Rejection Order. If you do not properly and timely file such proof of claim, you shall be forever barred from asserting any claims for such rejection damages.

Respectfully Submitted,  
October 8, 2020

/s/ *Matthew D. Cavanaugh*

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*Co-Counsel to the Debtors  
and Debtors in Possession*

**Attachment I<sup>1</sup>**

**Rejected Leases**

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<sup>1</sup> The inclusion of a Lease on this list does not constitute an admission as to the executory or non-executory nature of the Lease, or as to the existence or validity of any claims held by each Rejection Counterparty. All Leases listed herein shall have a rejection effective date of October 23, 2020.

**Lease Rejections - Effective as of October 23, 2020**

No.	Non-Debtor Counterparty	Counterparty Name	Counterparty Address or Email	Debtor Party	Contract Description	Store #	Location Address	Abandoned Personal Property
1	LEGACY EQUITY GROUP LLC	Shawn Storhaug	shawn@brookingspm.com	J. C. Penney Corporation, Inc.	Store Lease	4	990 22ND AVE S BROOKINGS, SD 57006	Miscellaneous FF&E and/or retail fixtures
2	REGENCY MALL REALTY LLC	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	5	9501 ARLINGTON EXPY STE 105 JACKSONVILLE, FL 32225	Miscellaneous FF&E and/or retail fixtures
3	FINGERLAKES MALL ACQUISITIONS	Rene Patterson	generalmanager@fingerlakesmall.com	J. C. Penney Corporation, Inc.	Store Lease	7	1579 CLARK STREET RD AUBURN, NY 13021	Miscellaneous FF&E and/or retail fixtures
4	GALLERIA ROCK HILL, LLC	Amani Abdul	adabdul@collettre.com	J. C. Penney Corporation, Inc.	Store Lease	89	2321 DAVE LYLE BLVD ROCK HILL, SC 29730	Miscellaneous FF&E and/or retail fixtures
5	LILAC MALL ASSOCIATES	Jim Kempner	jim@kempnerproperties.com	J. C. Penney Corporation, Inc.	Store Lease	133	25 LILAC MALL (RT 125) ROCHESTER, NH 3867	Miscellaneous FF&E and/or retail fixtures
6	TIMBER CREEK OWNER LP	Teresa Parker	tparker@theretailconnection.net	J. C. Penney Properties, LLC	Store Lease	179	6051 SKILLMAN ST DALLAS, TX 75231	Miscellaneous FF&E and/or retail fixtures
7	PETRIE ROSS VENTURES	Walt Petrie	wp@petrieross.com	J. C. Penney Corporation, Inc.	Store Lease	194	9100 MCHUGH DR STE 576 LANHAM, MD 20706	Miscellaneous FF&E and/or retail fixtures
8	BOULEVARD AT BOX HILL 5, LLC	Michelle Schiffer	mschiffer@ggcommercial.com	J. C. Penney Properties, LLC	Store Lease	209	3411 MERCHANT BLVD ABINGDON, MD 21009	Miscellaneous FF&E and/or retail fixtures
9	Namdar	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	221	1155 CARLISLE ST HANOVER, PA 17331	Miscellaneous FF&E and/or retail fixtures
10	MUNNCIE MALL LLC	Dan Scott	dan.scott@washingtonprime.com	J. C. Penney Corporation, Inc.	Store Lease	253	3501 GRANVILLE AVE MUNCIE, IN 47303	Miscellaneous FF&E and/or retail fixtures
11	JONES LANG LASALLE	Lisa Eberts	lisaeberts@BVBproperties.com	J. C. Penney Corporation, Inc.	Store Lease	287	901 US 27 N STE 150 SEBRING, FL 33870	Miscellaneous FF&E and/or retail fixtures
12	VINCENNES CENTER, LLC	Gabriel Jeidel	gjeidel@gjpropertygroup.com	J. C. Penney Corporation, Inc.	Store Lease	309	640 NIBLACK BLVD VINCENNES, IN 47591	Miscellaneous FF&E and/or retail fixtures
13	LAVAL ASSOCIATES II LLC	Ron Iemma	roni@gumberg.com	J. C. Penney Corporation, Inc.	Store Lease	373	1262 VOCKE RD STE 300 LA VALE, MD 21502	Miscellaneous FF&E and/or retail fixtures
14	WARWICK REALTY LLC	Gary Hurand	info@mgtdiv.com	J. C. Penney Corporation, Inc.	Store Lease	400	125 S MICHIGAN AVE BIG RAPIDS, MI 49307	Miscellaneous FF&E and/or retail fixtures
15	DLC MANAGEMENT CORP.	Adam Ifshin	aifshin@dlcmgmt.com	J. C. Penney Corporation, Inc.	Store Lease	426	251 HIGH ST TORRINGTON, CT 6790	Miscellaneous FF&E and/or retail fixtures
16	CONESTOGA REALTY LLC	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	456	3404 W 13TH ST GRAND ISLAND, NE 68803	Miscellaneous FF&E and/or retail fixtures
17	BOBENAL INVESTMENTS	Andrew Fine	andrew@thebobenalgroup.com	J. C. Penney Corporation, Inc.	Store Lease	528	1680 WRIGHT AVE ALMA, MI 48801	Miscellaneous FF&E and/or retail fixtures
18	Hull Property Group	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	581	800 S JAMES CAMPBELL BLVD COLUMBIA, TN 38401	Miscellaneous FF&E and/or retail fixtures
19	FASHION CENTER REALTY, LLC	Samson Pinter	samson@msrealtygroup.net	J. C. Penney Corporation, Inc.	Store Lease	608	814 US HWY 62-65 N STE 27 HARRISON, AR 72601	Miscellaneous FF&E and/or retail fixtures
20	ASHTABULA REALTY HOLDING, LLC	Mike Kohan	mikekohan@yahoo.com	J. C. Penney Corporation, Inc.	Store Lease	647	3315 N RIDGE RD E STE 100 ASHTABULA, OH 44004	Miscellaneous FF&E and/or retail fixtures
21	SOLID CAP PROPERTIES, LLC	Anita Artelejo	anita.artalejo@riowestmall.com	J. C. Penney Corporation, Inc.	Store Lease	671	3199 N WHITE SANDS ALAMOGORDO, NM 88310	Miscellaneous FF&E and/or retail fixtures

**Lease Rejections - Effective as of October 23, 2020**

No.	Non-Debtor Counterparty	Counterparty Name	Counterparty Address or Email	Debtor Party	Contract Description	Store #	Location Address	Abandoned Personal Property
22	Hull Property Group	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	681	2101 FT HENRY DR KINGSPORT, TN 37664	Miscellaneous FF&E and/or retail fixtures
23	HENDON	Charlie Hendon	charlie@hendonproperties.com	J. C. Penney Corporation, Inc.	Store Lease	687	3700 ATLANTA HWY ATHENS, GA 30606	Miscellaneous FF&E and/or retail fixtures
24	HOWARD PROPERTY PARTNERS LLC	Larry Rellinger	larry@rellinger.com	J. C. Penney Corporation, Inc.	Store Lease	703	408 E MITCHELL ST PETOSKEY, MI 49770	Miscellaneous FF&E and/or retail fixtures
25	TBB ORLANDO, LLC	Paul Motta	mottap@urbanretail.com	J. C. Penney Corporation, Inc.	Store Lease	709	3115 E COLONIAL DR ORLANDO, FL 32803	Miscellaneous FF&E and/or retail fixtures
26	DURANGO MALL LLC	Kim Rathbun	kim@durangomall.com	J. C. Penney Corporation, Inc.	Store Lease	733	800 S CAMINO DEL RIO DURANGO, CO 81301	Miscellaneous FF&E and/or retail fixtures
27	VERITAS	Amy Tharp	amy@veritasrealty.com	J. C. Penney Corporation, Inc.	Store Lease	780	1718 E BLVD KOKOMO, IN 46902	Miscellaneous FF&E and/or retail fixtures
28	SAWMILL SQUARE ASSOC	Richard Greene	sawmillsquare@bellsouth.net	J. C. Penney Corporation, Inc.	Store Lease	830	910 SAWMILL RD LAUREL, MS 39440	Miscellaneous FF&E and/or retail fixtures
29	STOCKBRIDGE LAKESHORE, LLC	Dr. Mahmoud Al Hadidi	dr.mahadidi@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	895	150 PEARL NIX PKWY GAINESVILLE, GA 30501	Miscellaneous FF&E and/or retail fixtures
30	Lionheart	Ashley Thornburg	ashleyt@lionheart.com	J. C. Penney Corporation, Inc.	Store Lease	910	4129 E WILDER RD BAY CITY, MI 48706	Miscellaneous FF&E and/or retail fixtures
31	AGREE	Joey Agree	leasing@agreerealty.com	J. C. Penney Corporation, Inc.	Store Lease	921	2231 S MISSION RD MT PLEASANT, MI 48858	Miscellaneous FF&E and/or retail fixtures
32	MULTI STATE HOLDINGS	General Contact	mellorpark@yahoo.com	J. C. Penney Corporation, Inc.	Store Lease	965	1845 N WEST AVE EL DORADO, AR 71730	Miscellaneous FF&E and/or retail fixtures
33	EUGENE P. MURPHY DBA TANDY TOWN	Gene Murphy	zephyr98@earthlink.net	J. C. Penney Corporation, Inc.	Store Lease	1116	1744 E CARL ALBERT PKWY MCALESTER, OK 74501	Miscellaneous FF&E and/or retail fixtures
34	TKG	Corey Wiemann	cwiemann@thekroenkegroup.com	J. C. Penney Corporation, Inc.	Store Lease	1130	3501 E BROADWAY TUCSON, AZ 85716	Miscellaneous FF&E and/or retail fixtures
35	ETHAN CONRAD	Chase Burke	chase@ethanconradprop.com	J. C. Penney Corporation, Inc.	Store Lease	1142	951 W PACHECO BLVD LOS BANOS, CA 93635	Miscellaneous FF&E and/or retail fixtures
36	JONES LANG LASALLE	Garr Herring	gar.herring@am.jll.com	J. C. Penney Corporation, Inc.	Store Lease	1148	300 MARY ESTHER BLVD MARY ESTHER, FL 32569	Miscellaneous FF&E and/or retail fixtures
37	LEWISTON CENTER PARTNERSHIP	Joan Peterson	Joan Peterson <jpeterson@lewistoncenter.com>	J. C. Penney Corporation, Inc.	Store Lease	1165	1826 19TH AVE LEWISTON, ID 83501	Miscellaneous FF&E and/or retail fixtures
38	MARSHALLTOWN CENTER IO LLC	William Winterburn	wwinterburn@lerner.com	J. C. Penney Corporation, Inc.	Store Lease	1228	2500 S CENTER ST MARSHALLTOWN, IA 50158	Miscellaneous FF&E and/or retail fixtures
39	MOEHN FAMILY, L.L.C	Paul Milligan	paul.milligan@csbcarroll.com	J. C. Penney Corporation, Inc.	Store Lease	1240	504 N ADAMS ST CARROLL, IA 51401	Miscellaneous FF&E and/or retail fixtures
40	Hull Property Group	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	1315	325 NORTHSIDE DR E STE 25 STATESBORO, GA 30458	Miscellaneous FF&E and/or retail fixtures
41	B. C. WOOD COMPANIES	Lee Cowden	lcowden@bcwoodproperties.com	J. C. Penney Corporation, Inc.	Store Lease	1322	1560 HOUSTONVILLE RD STE 301 DANVILLE, KY 40422	Miscellaneous FF&E and/or retail fixtures
42	REGENCY BEDFORD LLC	Craig Ramey	Ramey, Craig <CraigRamey@regencycenters.com>	J. C. Penney Corporation, Inc.	Store Lease	1324	1118 JAMES AVE BEDFORD, IN 47421	Miscellaneous FF&E and/or retail fixtures
43	ALPHA LAKE, LTD	Lawrence Haskins	jack@culpepperrealty.com	J. C. Penney Corporation, Inc.	Store Lease	1348	3560 LAMAR AVE HWY 82 PARIS, TX 75460	Miscellaneous FF&E and/or retail fixtures

**Lease Rejections - Effective as of October 23, 2020**

No.	Non-Debtor Counterparty	Counterparty Name	Counterparty Address or Email	Debtor Party	Contract Description	Store #	Location Address	Abandoned Personal Property
44	WEINER	Caroline Davis	caroline.davis@wsdevelopment.com	J. C. Penney Corporation, Inc.	Store Lease	1392	250 PLAINFIELD RD UNIT 202 WEST LEBANON, NH 3784	Miscellaneous FF&E and/or retail fixtures
45	PYRAMID	Timothy Kelley	timothykelley@pyramidmg.com	J. C. Penney Corporation, Inc.	Store Lease	1445	1 SANGERTOWN SQ STE 55 NEW HARTFORD, NY 13413	Miscellaneous FF&E and/or retail fixtures
46	LBJ VENTURES, LLC	BENEDITTO CAROCCIO	ben@fmautobody.com	J. C. Penney Corporation, Inc.	Store Lease	1512	1228 MAIN ST DELANO, CA 93215	Miscellaneous FF&E and/or retail fixtures
47	DESOTO OWNERS, LLC	Trina Silenzi	trina@desotomalls.com	J. C. Penney Corporation, Inc.	Store Lease	1514	303 301 BLVD W STE 701 BRADENTON, FL 34205	Miscellaneous FF&E and/or retail fixtures
48	CLEARVIEW MALL ASSOCIATES	Ron Iemma	roni@gumberg.com	J. C. Penney Corporation, Inc.	Store Lease	1535	101 CLEARVIEW CIRCLE BUTLER, PA 16001	Miscellaneous FF&E and/or retail fixtures
49	Hull Property Group	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	1650	301 COX CREEK PKWY (RT 133) FLORENCE, AL 35630	Miscellaneous FF&E and/or retail fixtures
50	TSM HOLDINGS, LLC	Matthew Hayden	mhayden@gulfstream.com	J. C. Penney Corporation, Inc.	Store Lease	1698	5000 FREDERICA ST OWENSBORO, KY 42301	Miscellaneous FF&E and/or retail fixtures
51	TIMES SQUARE REALTY LLC	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	1717	115 TIMES SQ MALL MT VERNON, IL 62864	Miscellaneous FF&E and/or retail fixtures
52	AKRON CENTER ASSOC, LP	Eric Lamm	elamm@execnet.net	J. C. Penney Corporation, Inc.	Store Lease	1787	1500 CANTON RD AKRON, OH 44312	Miscellaneous FF&E and/or retail fixtures
53	Brookfield	Chris Pine	chris.pine@brookfieldpropertiesretail.com	J. C. Penney Corporation, Inc.	Store Lease	1845	305 LIBERTY ST NE SALEM, OR 97301	Miscellaneous FF&E and/or retail fixtures
54	C. F. SMITH PROPERTIES, INC	Steve Trythall	strythall@cfsmithpg.com	J. C. Penney Corporation, Inc.	Store Lease	1847	1305 E BROAD AVE STE 13 ROCKINGHAM, NC 28379	Miscellaneous FF&E and/or retail fixtures
55	RICHMOND SQUARE MALL LLC	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	1860	4199 NATIONAL RD E RICHMOND, IN 47374	Miscellaneous FF&E and/or retail fixtures
56	BIGGS PARK, INC.	Kenny Biggs	kbiggs@nc.rr.com	J. C. Penney Corporation, Inc.	Store Lease	1908	2910 N ELM ST LUMBERTON, NC 28358	Miscellaneous FF&E and/or retail fixtures
57	STAUNTON MALL LLC	Dennis Russell	dennis@aspirealestate.com	J. C. Penney Corporation, Inc.	Store Lease	1911	90 LEE JACKSON HWY STE 1268 STAUNTON, VA 24401	Miscellaneous FF&E and/or retail fixtures
58	Hull Property Group	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	1919	3100 M L KING JR BLVD NEW BERN, NC 28562	Miscellaneous FF&E and/or retail fixtures
59	KNA FAMILY LLC	Bhushan Khanna	bradfordsqky@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	1928	4000 FT CAMPBELL BLVD HOPKINSVILLE, KY 42240	Miscellaneous FF&E and/or retail fixtures
60	CACHE VALLEY REALTY LLC	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	1934	1350 N MAIN ST LOGAN, UT 84341	Miscellaneous FF&E and/or retail fixtures
61	CORNING COMPANIES	Lilly Corning	lillycorning@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	1935	2825 W MAIN ST STE C BOZEMAN, MT 59718	Miscellaneous FF&E and/or retail fixtures
62	ATR CORINTH NORTHLAKE LLC	Kirk Dotson	kirk@atrcorinth.com	J. C. Penney Corporation, Inc.	Store Lease	1962	4840 BRIARCLIFF RD NE ATLANTA, GA 30345	Miscellaneous FF&E and/or retail fixtures
63	JUSTER	Gary Juster	gej@justerdevelopment.com	J. C. Penney Corporation, Inc.	Store Lease	1991	99 BENNINGTON SQ BENNINGTON, VT 5201	Miscellaneous FF&E and/or retail fixtures
64	40 BATAVIA CENTRE, LLC	Glenn Chudacoff	glenn@twentylake.com	J. C. Penney Corporation, Inc.	Store Lease	1997	40 BATAVIA CITY CTR BATAVIA, NY 14020	Miscellaneous FF&E and/or retail fixtures
65	G&I IX EMPIRE FREEDOM PLAZA LLC	Basil Donnelly	aifshin@dlcmgmt.com	J. C. Penney Corporation, Inc.	Store Lease	2008	205 ERIE BLVD W ROME, NY 13440	Miscellaneous FF&E and/or retail fixtures

**Lease Rejections - Effective as of October 23, 2020**

No.	Non-Debtor Counterparty	Counterparty Name	Counterparty Address or Email	Debtor Party	Contract Description	Store #	Location Address	Abandoned Personal Property
66	ALLIED DEVELOPMENT CO., INC.	Robert Mott	Robert@allied-development.com	J. C. Penney Corporation, Inc.	Store Lease	2010	7900 DAY DR PARMA, OH 44129	Miscellaneous FF&E and/or retail fixtures
67	CITY OF PALESTINE	Leslie Cloer	citymanager@palestine-tx.org	J. C. Penney Corporation, Inc.	Store Lease	2020	1930 S LOOP 256 PALESTINE, TX 75801	Miscellaneous FF&E and/or retail fixtures
68	MONROE RETAIL GROUP LLC	Todd Routh	toddrouth2685@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	2039	1410 SPARTA ST MCMINNVILLE, TN 37110	Miscellaneous FF&E and/or retail fixtures
69	MOLLA INVESTMENTS LLC	General Contact	solo214@aol.com	J. C. Penney Corporation, Inc.	Store Lease	2076	2338 US 23 S ALPENA, MI 49707	Miscellaneous FF&E and/or retail fixtures
70	Hull Property Group	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	2079	325 PIEDMONT DR DANVILLE, VA 24540	Miscellaneous FF&E and/or retail fixtures
71	MONROE RETAIL GROUP LLC	Todd Routh	toddrouth2685@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	2089	905 N 12TH ST STE 10 MIDDLESBORO, KY 40965	Miscellaneous FF&E and/or retail fixtures
72	FOOTHILLS MALL EQUITIES, LLC	Ami Ziff	aziff@timeequities.com	J. C. Penney Corporation, Inc.	Store Lease	2098	101 FOOTHILLS MALL MARYVILLE, TN 37801	Miscellaneous FF&E and/or retail fixtures
73	WV CROSSROADS REALTY, LLC	Dennis Brown	Dennis Brown <dbrown@triyar.com>	J. C. Penney Corporation, Inc.	Store Lease	2105	6834 WESLEY ST STE C GREENVILLE, TX 75402	Miscellaneous FF&E and/or retail fixtures
74	COVINGTON MALL, LLC	Stephen Saunders	ssaunders@ssaunders.com	J. C. Penney Corporation, Inc.	Store Lease	2119	922 RIVER FALLS ST ANDALUSIA, AL 36420	Miscellaneous FF&E and/or retail fixtures
75	SB RETAIL GROUP CARLSBAD LLC	Todd Routh	toddrouth2685@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	2121	4125 W OWEN K GARRIOTT RD ENID, OK 73703	Miscellaneous FF&E and/or retail fixtures
76	D & L FERGUSON, LLC	Derek Ferguson	derekferguson@yahoo.com	J. C. Penney Corporation, Inc.	Store Lease	2122	2500 W STATE ST STE 118 ALLIANCE, OH 44601	Miscellaneous FF&E and/or retail fixtures
77	ROCKSTEP WILLMAR LLC	Andy Weiner	andyweiner@rockstep.com	J. C. Penney Corporation, Inc.	Store Lease	2147	1605 SOUTH FIRST STREET WILLMAR, MN 56201	Miscellaneous FF&E and/or retail fixtures
78	PRINCE OF ORANGE, LLC	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	2152	2390 CHESTNUT ST ORANGEBURG, SC 29115	Miscellaneous FF&E and/or retail fixtures
79	99-POWELL, LLC	Darren Dickerhoof	darren@dickerhoof.com	J. C. Penney Corporation, Inc.	Store Lease	2166	1810 FORT JONES RD YREKA, CA 96097	Miscellaneous FF&E and/or retail fixtures
80	COOL KIDS, LLC	BRENT MOWINSKI	brent.mowinski@voyafa.com	J. C. Penney Corporation, Inc.	Store Lease	2196	201 S WASHINGTON ST OWOSSO, MI 48867	Miscellaneous FF&E and/or retail fixtures
81	RAUL WALTERS PROPERITES	General Contact	stlouis@raulwalters.com	J. C. Penney Corporation, Inc.	Store Lease	2198	2206 S BALTIMORE ST KIRKSVILLE, MO 63501	Miscellaneous FF&E and/or retail fixtures
82	FLINTHILLS MALL LLC	David Lewis	dlewis@weigandomega.com	J. C. Penney Corporation, Inc.	Store Lease	2210	1678 INDUSTRIAL RD EMPORIA, KS 66801	Miscellaneous FF&E and/or retail fixtures
83	ACTION 49 JUNCTION I LLC	David Nichols	david@apusa1.com	J. C. Penney Corporation, Inc.	Store Lease	2220	2700 LAKE RD DYERSBURG, TN 38024	Miscellaneous FF&E and/or retail fixtures
84	WEST HILL GROUP	Marshall Willey	marshallwilley@aol.com	J. C. Penney Corporation, Inc.	Store Lease	2224	2 FINANCIAL PLAZA HUNTSVILLE, TX 77340	Miscellaneous FF&E and/or retail fixtures
85	GUMBERG	Ron Iemma	roni@gumberg.com	J. C. Penney Corporation, Inc.	Store Lease	2225	1500 N CLINTON ST DEFIANCE, OH 43512	Miscellaneous FF&E and/or retail fixtures
86	LIBERAL PLAZA LLC	Gabriel Jeidel	gjeidel@gjpropertygroup.com	J. C. Penney Corporation, Inc.	Store Lease	2238	1513 N KANSAS AVE LIBERAL, KS 67901	Miscellaneous FF&E and/or retail fixtures
87	CENTRAL MALL REALTY HOLDING LLC	David Rhodes	drhodes@igpbusinessgroup.com	J. C. Penney Corporation, Inc.	Store Lease	2239	2259 S 9TH ST SALINA, KS 67401	Miscellaneous FF&E and/or retail fixtures
88	BONNER MALL	Jim Koon	jim@cdabroker.com	J. C. Penney Corporation, Inc.	Store Lease	2243	300 BONNER MALL WAY STE 60 PONDERAY, ID 83852	Miscellaneous FF&E and/or retail fixtures
89	PYRAMID	Timothy Kelley	timothykelley@pyramidmg.com	J. C. Penney Corporation, Inc.	Store Lease	2246	2001 SOUTH RD (RT 9) POUGHKEEPSIE, NY 12601	Miscellaneous FF&E and/or retail fixtures



**Lease Rejections - Effective as of October 23, 2020**

No.	Non-Debtor Counterparty	Counterparty Name	Counterparty Address or Email	Debtor Party	Contract Description	Store #	Location Address	Abandoned Personal Property
90	PREIT	Dan Herman	Daniel Herman <Dan.Herman@preit.com>	J. C. Penney Corporation, Inc.	Store Lease	2257	2701 DAVID H MCLEOD BLVD FLORENCE, SC 29501	Miscellaneous FF&E and/or retail fixtures
91	GREELEY MALL LLC	Shaw! Pryor	s.pryor@mlgpllc.com	J. C. Penney Properties, LLC	Store Lease	2266	2080 GREELEY MALL GREELEY, CO 80631	Miscellaneous FF&E and/or retail fixtures
92	OOTB SHAWNEE, LLC	Paul Motta	ashleyt@lionheart.com	J. C. Penney Corporation, Inc.	Store Lease	2279	4901 N KICKAPOO AVE STE 4000 SHAWNEE, OK 74804	Miscellaneous FF&E and/or retail fixtures
93	ARROWHEAD MALL, LLC	Kathy Wilkinson	kwilkinson@colonialcre.com	J. C. Penney Corporation, Inc.	Store Lease	2288	501 N MAIN ST STE 118 MUSKOGEE, OK 74401	Miscellaneous FF&E and/or retail fixtures
94	REGENCY MADISON LLC	Craig Ramey	Ramey, Craig <CraigRamey@regencycenters.com>	J. C. Penney Corporation, Inc.	Store Lease	2324	435 E CLIFTY DR MADISON, IN 47250	Miscellaneous FF&E and/or retail fixtures
95	SIMA	Kevin J. Burnes	kburnes@sima.net	J. C. Penney Corporation, Inc.	Store Lease	2341	63455 N HWY 97 STE 93 BEND, OR 97701	Miscellaneous FF&E and/or retail fixtures
96	LERNER HEIDENBERG PROPERTIES	Ken Simon	ksimon@heidenbergproperties.com	J. C. Penney Corporation, Inc.	Store Lease	2342	282 BERLIN MALL RD UNIT 19 BERLIN, VT 5602	Miscellaneous FF&E and/or retail fixtures
97	MIAMI VALLEY MALL REALTY HOLDING LLC	Mike Kohan	mikekohan@yahoo.com	J. C. Penney Corporation, Inc.	Store Lease	2343	987 E ASH ST PIQUA, OH 45356	Miscellaneous FF&E and/or retail fixtures
98	CHASE PROPERTIES LTD	Brendon Ruth	bruth@chaseprop.com	J. C. Penney Corporation, Inc.	Store Lease	2357	1350 PILGRIM LN PLYMOUTH, IN 46563	Miscellaneous FF&E and/or retail fixtures
99	WINTER	Doug Winter	jdouglaswinter@aol.com	J. C. Penney Corporation, Inc.	Store Lease	2358	1810 S WEST AVE FREEPORT, IL 61032	Miscellaneous FF&E and/or retail fixtures
100	US PROPERTIES GROUP	Cynthia Hicks	chicks@uspginc.com	J. C. Penney Corporation, Inc.	Store Lease	2372	328 ROBERT SMALLS PKWY BEAUFORT, SC 29906	Miscellaneous FF&E and/or retail fixtures
101	GREENVILLE WEST LLC	Fred Scalese	fscalese@carnegiecos.com	J. C. Penney Corporation, Inc.	Store Lease	2381	300 GREENVILLE W DR STE 1 GREENVILLE, MI 48838	Miscellaneous FF&E and/or retail fixtures
102	FARBMAN	Bill Bubniak	bubniak@farbman.com	J. C. Penney Corporation, Inc.	Store Lease	2382	1550 N MITCHELL ST CADILLAC, MI 49601	Miscellaneous FF&E and/or retail fixtures
103	Lionheart	Ashley Thornburg	ashleyt@lionheart.com	J. C. Penney Corporation, Inc.	Store Lease	2392	1600 N STATE RT 50 BOURBONNAIS, IL 60914	Miscellaneous FF&E and/or retail fixtures
104	WIDEWATERS GROUP, INC.	Shawn Marie Deforge	sdeforge@widewaters.com	J. C. Penney Corporation, Inc.	Store Lease	2396	3225 STATE RT 364 STE 165 CANANDAIGUA, NY 14424	Miscellaneous FF&E and/or retail fixtures
105	RAM PROPERTY DEVELOPMENT, LLC	General Contact	admin@silvamgmt.com	J. C. Penney Corporation, Inc.	Store Lease	2423	780 NW GARDEN VLY BLVD STE 160 ROSEBURG, OR 97471	Miscellaneous FF&E and/or retail fixtures
106	SAF INVESTMENTS	Steven Fried	safinvest1@cox.net	J. C. Penney Corporation, Inc.	Store Lease	2431	1100-B HWY 260 COTTONWOOD, AZ 86326	Miscellaneous FF&E and/or retail fixtures
107	Doyle Rogers Co.	General Contact	doyrog@sbcglobal.com	J. C. Penney Corporation, Inc.	Store Lease	2436	475 S ST LOUIS ST BATESVILLE, AR 72501	Miscellaneous FF&E and/or retail fixtures
108	ROCKSTEP STARKVILLE LLC	Andy Weiner	andyweiner@rockstep.com	J. C. Penney Corporation, Inc.	Store Lease	2447	864 HWY 12 W STARKVILLE, MS 39759	Miscellaneous FF&E and/or retail fixtures
109	REGENCY CAMPBELLSVILLE LLC	Craig Ramey	Ramey, Craig <CraigRamey@regencycenters.com>	J. C. Penney Corporation, Inc.	Store Lease	2449	399 CAMPBELLSVILLE BYPASS CAMPBELLSVILLE, KY 42718	Miscellaneous FF&E and/or retail fixtures
110	Hull Property Group	Ky Widener	kwidener@hullstoreygibson.com	J. C. Penney Corporation, Inc.	Store Lease	2452	300 MOUNT BERRY SQ NE ROME, GA 30165	Miscellaneous FF&E and/or retail fixtures

## Lease Rejections - Effective as of October 23, 2020

No.	Non-Debtor Counterparty	Counterparty Name	Counterparty Address or Email	Debtor Party	Contract Description	Store #	Location Address	Abandoned Personal Property
111	PYRAMID	Timothy Kelley	timothykelley@pyramidmg.com	J. C. Penney Corporation, Inc.	Store Lease	2457	9559 DESTINY USA DR SYRACUSE, NY 13290	Miscellaneous FF&E and/or retail fixtures
112	CROMEANS	Joe Cromeans Jr	graycromeans@yahoo.com	J. C. Penney Corporation, Inc.	Store Lease	2458	1601 S BROAD SCOTTSBORO, AL 35768	Miscellaneous FF&E and/or retail fixtures
113	MIDLAND ATLANTIC	Kyle Nageleisen	knageleisen@midlandatlantic.com	J. C. Penney Corporation, Inc.	Store Lease	2470	US 68 S AND AA HWY MAYSVILLE, KY 41056	Miscellaneous FF&E and/or retail fixtures
114	MD RUSTON PROPERTIES, LLC	Shane Morrison	shane@morrison-usa.com	J. C. Penney Corporation, Inc.	Store Lease	2494	200 PAUL HUFF PKWY NW STE 44 CLEVELAND, TN 37312	Miscellaneous FF&E and/or retail fixtures
115	UNIVERSITY MALL REALTY LLC	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	2503	1201 E MAIN CARBONDALE, IL 62901	Miscellaneous FF&E and/or retail fixtures
116	STILES	Kenneth Stiles	kenneth.stiles@stiles.com	J. C. Penney Corporation, Inc.	Store Lease	2622	2301 DEL PRADO BLVD STE 700 CAPE CORAL, FL 33990	Miscellaneous FF&E and/or retail fixtures
117	MARCH HARE, LLC	Katie Thompson	katie@deeringmanagementgroup.com	J. C. Penney Corporation, Inc.	Store Lease	2671	2180 NE HWY 99 W MCMINNVILLE, OR 97128	Miscellaneous FF&E and/or retail fixtures
118	LIBBY	Robert Libby	rolibby350@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	2672	380 N COOPER DR HENDERSON, NC 27536	Miscellaneous FF&E and/or retail fixtures
119	TOLSON	Harvey Tolson	dboyte@tolsonent.com	J. C. Penney Corporation, Inc.	Store Lease	2695	16280 DRESDEN AVE SPACE M E LIVERPOOL, OH 43920	Miscellaneous FF&E and/or retail fixtures
120	TRACY MALL PARTNERS, LP	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	2698	3100 NAGLEE RD TRACY, CA 95304	Miscellaneous FF&E and/or retail fixtures
121	STOCKBRIDGE MADISON, LLC	Mahmoud Al-Hadidi	dr.malhadidi@gmail.com	J. C. Penney Corporation, Inc.	Store Lease	2705	501 EAGLE RIDGE DR LAKE WALES, FL 33859	Miscellaneous FF&E and/or retail fixtures
122	RCG-WAYCROSS MALL LLC	Michael McMillen	mikem@rcgventures.com	J. C. Penney Corporation, Inc.	Store Lease	2716	2215 MEMORIAL DR WAYCROSS, GA 31501	Miscellaneous FF&E and/or retail fixtures
123	OMACHE SHOPPING CENTER LLC	Colin Conway	cconway@naiblack.com	J. C. Penney Corporation, Inc.	Store Lease	2719	715 OMACHE DR OMAK, WA 98841	Miscellaneous FF&E and/or retail fixtures
124	PREIT	Dan Herman	Daniel Herman <Dan.Herman@preit.com>	J. C. Penney Corporation, Inc.	Store Lease	2736	3500 EAST WEST HWY STE 1000 HYATTSVILLE, MD 20782	Miscellaneous FF&E and/or retail fixtures
125	NINE ISLANDS II, LLC	Joe Vieira	joe@vieiraco.com	J. C. Penney Properties, LLC	Store Lease	2742	1840 COUNTRYSIDE DR TURLOCK, CA 95380	Miscellaneous FF&E and/or retail fixtures
126	Lionheart	Ashley Thornburg	ashleyt@lionheart.com	J. C. Penney Corporation, Inc.	Store Lease	2755	120 NIBLICK RD PASO ROBLES, CA 93446	Miscellaneous FF&E and/or retail fixtures
127	SYFELD KEENE ASSOCIATES	Judy Mandell	syfeldconsultant@aol.com	J. C. Penney Corporation, Inc.	Store Lease	2777	381 WEST ST KEENE, NH 3431	Miscellaneous FF&E and/or retail fixtures
128	BRE DDR RIVERDALE VILLAGE INNER RING LLC	Marielle de la Hoz	mdelaho@sitecenters.com	J. C. Penney Corporation, Inc.	Store Lease	2825	12550 RIVERDALE BLVD COON RAPIDS, MN 55448	Miscellaneous FF&E and/or retail fixtures
129	HOUSTON CHENGDU JINDI LLC	Brandon O'Connell	boconnell@midamericagrp.com	J. C. Penney Corporation, Inc.	Store Lease	2829	13701 GROVE DR MAPLE GROVE, MN 55311	Miscellaneous FF&E and/or retail fixtures
130	GCTC HOLDINGS, LLC	Stuart Smith	stuart_smith@cblproperties.com	J. C. Penney Corporation, Inc.	Store Lease	2843	10083 GULF CENTER DR FORT MYERS, FL 33913	Miscellaneous FF&E and/or retail fixtures
131	PITT REALTY LLC	Elliot Nassim	Elliot@masonam.com	J. C. Penney Corporation, Inc.	Store Lease	2847	167 PITTSBURGH MILL CIR TARENTUM, PA 15084	Miscellaneous FF&E and/or retail fixtures
132	VEREIT	Chuck Vogel	cvogel@vereit.com	J. C. Penney Corporation, Inc.	Store Lease	2870	17610 E 39TH ST S INDEPENDENCE, MO 64055	Miscellaneous FF&E and/or retail fixtures

**Lease Rejections - Effective as of October 23, 2020**

No.	Non-Debtor Counterparty	Counterparty Name	Counterparty Address or Email	Debtor Party	Contract Description	Store #	Location Address	Abandoned Personal Property
133	CYPRESS/SPANISH FORT I, LP	Chris Maguire	Chris.Maguire@CypressEquities.com	J. C. Penney Properties, LLC	Store Lease	2875	22500 TOWN CENTER AVE SPANISH FORT, AL 36527	Miscellaneous FF&E and/or retail fixtures
134	KGI	Richard Bornstein	bornstein@thekofflergroup.com	J. C. Penney Corporation, Inc.	Store Lease	2880	STATE HWY 16 & RT 302 NORTH CONWAY, NH 3860	Miscellaneous FF&E and/or retail fixtures
135	CHRISTOWN 1755, LLC	Robert Nadler	rnadler@kimcorealty.com	J. C. Penney Corporation, Inc.	Store Lease	2889	1727 W BETHANY HOME RD PHOENIX, AZ 85015	Miscellaneous FF&E and/or retail fixtures
136	SWG INDIANAPOLIS, LLC	General Contact	awickley@yahoo.com	J. C. Penney Corporation, Inc.	Store Lease	2901	8752 MICHIGAN RD INDIANAPOLIS, IN 46268	Miscellaneous FF&E and/or retail fixtures
137	BONIUK INTERESTS LTD	General Contact	mboniuk@bcm.edu	J. C. Penney Corporation, Inc.	Store Lease	2915	135 BOCKMAN DR FORT COLLINS, CO 80525	Miscellaneous FF&E and/or retail fixtures
138	RIVER LANDING PROPERTIES, INC.	Timothy Lowe	tlowe@tsgproperties.com	J. C. Penney Properties, LLC	Store Lease	2932	3400 RIO GRANDE AVE MONTROSE, CO 81401	Miscellaneous FF&E and/or retail fixtures
139	PLATINUM REALTY	Che Chen Liu & Shu Fen Liu	royolast@aol.com	J. C. Penney Properties, LLC	Store Lease	2937	14659 RAMONA AVE CHINO, CA 91710	Miscellaneous FF&E and/or retail fixtures
140	COLLETT & ASSOCIATES	John Collett	jcollett@collettre.com	J. C. Penney Properties, LLC	Store Lease	2942	7271 SE 29TH ST MIDWEST CITY, OK 73110	Miscellaneous FF&E and/or retail fixtures
141	SSC GOVERNORS PLAZA WM, LLC	Julie Engle	jengle@castoinfo.com	J. C. Penney Corporation, Inc.	Store Lease	2978	9365 FIELDS ERTEL RD CINCINNATI, OH 45249	Miscellaneous FF&E and/or retail fixtures
142	Bridgestone Retail Operations, LLC	-	Attn: Lease Administration/Real Estate Bridgestone Tower 200 4th Avenue South Nashville, TN 37201	J. C. Penney Corporation, Inc.	Sublease	5 / 5410	9501 ARLINGTON EXPY STE 105 JACKSONVILLE, FL 32225	Miscellaneous FF&E and/or retail fixtures
143	Bridgestone Retail Operations, LLC	-	Attn: Lease Administration/Real Estate Bridgestone Tower 200 4th Avenue South Nashville, TN 37201	J. C. Penney Corporation, Inc.	Sublease	1130 / 5303	3501 E BROADWAY TUCSON, AZ 85716	Miscellaneous FF&E and/or retail fixtures
144	Bridgestone Retail Operations, LLC	-	Attn: Lease Administration/Real Estate Bridgestone Tower 200 4th Avenue South Nashville, TN 37201	J. C. Penney Corporation, Inc.	Sublease	1514 / 5410	303 301 BLVD W STE 701 BRADENTON, FL 34205	Miscellaneous FF&E and/or retail fixtures

**Attachment II**

**Proposed Rejection Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

In re:	)	
	)	Chapter 11
	)	
J. C. PENNEY COMPANY, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 20-20182 (DRJ)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Re: Docket No. [●]</b>

**ORDER APPROVING THE ABANDONMENT OF CERTAIN PROPERTY  
AND THE REJECTION OF CERTAIN UNEXPIRED LEASES**

Pursuant to the order approving procedures for the rejection of the Debtors’ executory contracts and unexpired leases, and granting related relief (the “Procedures Order”)<sup>2</sup> [Docket No. 722] and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b) and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and the Debtors having properly filed and served a Rejection Notice to each applicable Rejection Counterparty set forth in the Amended Rejection Schedule attached hereto as **Exhibit A** in accordance with the terms of the Procedures Order; and no timely objections have been filed to the rejection of such Leases; and due and proper notice of the Procedures Order and Rejection

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://cases.primeclerk.com/JCPenney>. The location of Debtor J. C. Penney Company, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 6501 Legacy Drive, Plano, Texas 75024.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Procedures Order.

Notice having been provided to each applicable counterparty as set forth in the Amended Rejection Schedule, and it appearing that no other notice need be provided; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The rejection of the Leases as set forth in the Amended Rejection Schedule is hereby approved.

2. The Debtors are authorized to abandon any personal property remaining on the leased premises that is disclosed in the applicable Rejection Notice served upon each Rejection Counterparty. For the avoidance of doubt, any and all property located on the Debtors' leased premises on the Rejection Date of the applicable Lease shall be deemed abandoned pursuant to section 554 of the Bankruptcy Code, as is, effective as of the Rejection Date. The landlord may use or dispose of such abandoned property without further notice or Court order free and clear of all liens, claims, encumbrances and interests, and without notice or liability, to the Debtors, or any third party; *provided* that such property has been reasonably described in the applicable Rejection Schedule and a Rejection Notice was served upon each Rejection Counterparty. To the extent applicable, the automatic stay is modified to permit such use or disposition, including but not limited to the transfer of title by the applicable Debtor(s).

3. Any claims against the Debtors arising from the rejection of the Leases as set forth in the Amended Rejection Schedule must be filed no later than the later of (i) the deadline for filing proofs of claim established in these chapter 11 cases, (ii) thirty (30) days after the applicable Rejection Date set forth in the Amended Rejection Schedule attached hereto, and (iii) thirty (30) days from the date of this Rejection Order.

4. The Debtors are authorized to take any action necessary to implement the terms of this Rejection Order and the rejection without further order from this Court.

5. The rejection of the Leases as set forth in the Amended Rejection Schedule shall be effective as of the later of (a) the date set forth in the Amended Rejection Schedule and (b) with respect to a Lease, the date upon which the Debtors in writing (email sufficient) surrender the premises to the landlord and (i) return the keys, key codes, or security codes, if any, to the affected landlord or (ii) notify the affected landlord in writing (email sufficient) that the keys, key codes, and security codes, if any, are not available, but the landlord may rekey the leased premises.

6. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Rejection Order.

Dated: \_\_\_\_\_, 2020

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JUDGE DAVID R. JONES  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit A**<sup>1</sup>

**Amended Rejection Schedule**

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<sup>1</sup> The inclusion of a Lease on this list does not constitute an admission as to the executory or non-executory nature of the Lease, or as to the existence or validity of any claims held by each Rejection Counterparty.